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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**IN RE:**

**CASE NO.: 10-60181**

**OCCUPATIONAL & MEDICAL  
INNOVATIONS LIMITED**

**CHAPTER 15**

**DEBTOR**

**REPLY TO OBJECTION FILED BY RETRACTABLE  
TECHNOLOGIES, INC.**

**NOW INTO COURT**, through the undersigned counsel and through its duly designated administrators, David Michael Stimpson and Terrence John Rose of SV Partners, Insolvency Accountants and Business Solutions of Brisbane, Australia, comes Occupational & Medical Innovations, Ltd. (“OMI”), who respectfully move the court for an emergency hearing on their previously filed motion for provisional relief pursuant to 11 U.S.C. § 1519, and respectfully represents as follows:

1.

Retractable Technologies, Inc.’s (“RTI”) Objection is untrue in its claims of gamesmanship.

2.

The undersigned counsel made and offer to counsel for RTI for the entry of a preliminary injunction in the substance of the permanent injunction RTI seeks in the pending patent litigation.

3.

The administrators simply seek the maintenance of the *status quo* pending “Proposal for a Deed of Company Arrangement from AssistMed (Australia) Pty., Ltd.

**WHEREFORE**, Occupational & Medical Innovations, Ltd., and its duly appointed administrators pray that this Honorable Court enter an order pursuant to 11 U.S.C. § 1519, extending the automatic stay pursuant to 11 U.S.C. § 362 of the Bankruptcy Code to the foreign debtors Chapter 15 case, and specifically staying any further proceedings in Retractable Technologies, Inc. v. Occupational & Medical Innovations, Ltd., Civil Action No. 6: 08-cv-00120, pending in the United States District Court for the Eastern District of Texas, Tyler Division, pending this court’s hearing on March 18, 2010, at 2:00 o’clock p.m. to determine whether or not this court will recognize the insolvency proceedings of Occupational & Medical Innovations, Ltd., and for such other and further relief as is justified in the premises.

Alexandria, Louisiana, this 2<sup>nd</sup> day of March, 2010.

Respectfully submitted:

**GOLD, WEEMS, BRUSER, SUES & RUNDELL**

By: /s/Bradley L. Drell  
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**ATTORNEYS FOR OCCUPATIONAL &  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing **REPLY TO OBJECTION FILED**  
**BY RETRACTABLE TECHNOLOGIES, INC.** has been Patrick Kelley (via email:  
[patkelly@icklawn.com](mailto:patkelly@icklawn.com)) on this 2nd day of March, 2010.

/s/Bradley L. Drell  
OF COUNSEL